

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

JUDITH A. TAYLOR,

Plaintiff,

v.

ST. LOUIS COUNTY BOARD OF ELECTION
COMMISSIONERS, et. al.,

Defendants.

No. 4:07-CV-1544 TCM

MOTION:	
Granted	<input checked="checked" type="checkbox"/>
Denied	<input type="checkbox"/>
Overruled	<input type="checkbox"/>
Date	<u>9/4/08</u>

JOINT CONSENT MOTION TO RESCHEDULE HEARING

The parties, by and through their undersigned counsel of record, hereby consent and jointly move to reschedule the hearing on Defendants' Motion to Compel Production of Plaintiff's Medical Records, currently set for hearing on September 9, 2008 at 9:00 a.m. Good cause exists for said joint motion. Plaintiff's deposition was recently taken on August 26, 2008. During her deposition, Plaintiff testified to a psychological condition prior to her discharge on February 24, 2007. Furthermore, Plaintiff explicitly deferred to her prior medical records when asked about the specifics of her prior condition. Therefore, the additional time is required so that Defendants can obtain the deposition transcript, and use it in its Reply to Plaintiff's Opposition.

Furthermore, following the depositions of the individual Defendants, Plaintiff intends to move to compel certain testimony concerning which Defendants asserted privilege. Rescheduling the hearing would allow Plaintiff to bring her motion concurrently with Defendants Motion to Compel Production of Plaintiff's Medical Records.

Therefore, the parties respectfully request that the Court grant an extension of at least three (3) weeks from the current hearing date of September 9, 2008.